

EXHIBIT 15

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
NEWPORT NEWS DIVISION

BOBBY BLAND, DANIEL RAY CARTER, JR.,
DAVID W. DIXON, ROBERT W. MCCOY,
JOHN C. SANDHOFER, and
DEBRA H. WOODWARD,

Plaintiffs,

CASE NO.
4:11-CV-45

v.

B.J. ROBERTS, individually and in
his official capacity as Sheriff of
the City of Hampton, Virginia,

Defendant.

DEPOSITION UPON ORAL EXAMINATION
OF CRYSTAL COOKE,
TAKEN ON BEHALF OF THE PLAINTIFFS

Virginia Beach, Virginia

October 11, 2011

Appearances:

PATTEN, WORNOM, HATTEN & DIAMONSTEIN, L.C.
By: JAMES H. SHOEMAKER, JR., ESQUIRE
Counsel for the Plaintiffs

PENDER & COWARD
By: JEFF W. ROSEN, ESQUIRE
Counsel for the Defendant

1 MR. SHOEMAKER: I'm getting ready to shift
2 topics here. Why don't we take a quick break, say a
3 five-minute break. We'll come back in five minutes.

4 THE DEPONENT: Okay.

5
6 (Recess)

7
8 BY MR. SHOEMAKER:

9 Q. Let's go back on the record.

10 Ma'am, do you remember there coming a time
11 in August or September of 2009 when it came to light
12 that there was a cookout or a picnic attended -- or
13 given by Ramona Larkin?

14 A. Yes.

15 Q. Okay. Did Ramona Larkin work for you?

16 A. Yes.

17 Q. And how did you learn about that event?

18 A. It was her birthday weekend and she was
19 having a cookout so she invited the shift.

20 Q. Did you go?

21 A. No.

22 Q. Did you come to learn that Jim Adams
23 attended that event?

24 A. Yes.

25 Q. How did you learn about that?